



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

**Region 6**

**1445 Ross Avenue, Suite 1200  
Dallas, TX 75202-2733**

April 15, 2015

Dr. Jane Summerson  
NEPA Document Manager  
Plains and Eastern EIS  
216 16<sup>th</sup> Street, Suite 1500  
Denver, Colorado 80202

Dear Dr. Summerson:

In accordance with our responsibilities under Section 309 of the Clean Air Act (CAA), the National Environmental Policy Act (NEPA), and the Council on Environmental Quality (CEQ) regulations for implementing NEPA, the U.S. Environmental Protection Agency (EPA) Region 6 office in Dallas, Texas, has completed its review of the Draft Environmental Impact Statement (DEIS) prepared by the Department of Energy (DOE) for the Plains and Eastern Clean Line Transmission Line Project.

The Draft EIS analyzes potential environmental impacts of a No Action Alternative and several alternatives to the Applicant Proposed Project, including alternative routes for the HVDC transmission line and adding a converter station in Arkansas. The Applicant's Proposed Project would include an overhead 600-kilovolt (kV) high voltage direct current (HVDC) electric transmission system and associated facilities with the capacity to deliver approximately 3,500 megawatts primarily from renewable energy generation facilities in the Oklahoma and Texas Panhandle regions to the Mid-South and Southeast United States via an interconnection with the Tennessee Valley Authority in Tennessee.

EPA has rated the DEIS as **LO "Lack of Objections"**. The EPA's Rating System Criteria can be found here: <http://www.epa.gov/oecaerth/nepa/comments/ratings.html>. We have also enclosed detailed comments for your consideration which we believe will strengthen the Final EIS.

EPA appreciates the opportunity to review the DEIS. Our classification will be published on the EPA website, <http://www.epa.gov/compliance/nepa/eisdata.html>, according to our responsibility under Section 309 of the CAA to inform the public of our views on the proposed Federal action. Please send our office one copy of the Final EIS (FEIS). If you have any questions or concerns, please contact Michael Jansky of my staff at [jansky.michael@epa.gov](mailto:jansky.michael@epa.gov) or 214-665-7451 for assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Marie Stucky", is written over a horizontal line.

Marie Stucky, Acting Chief  
Office of Planning and Coordination  
Office of Strategic Planning and Analyses

Enclosure:



**DETAILED COMMENTS  
ON THE  
DRAFT ENVIRONMENTAL IMPACT STATEMENT  
PREPARED BY  
THE DEPARTMENT OF ENERGY  
FOR THE  
PLAINS AND EASTERN CLEAN LINES TRANSMISSION PROJECT  
OKLAHOMA, TENNESSEE, AND ARKANSAS**

**Environmental Justice**

DOE has done a thorough assessment and has been inclusive and transparent in accordance to the regulations. EPA believes the communication strategy goes beyond the Federal Register requirements.

***Recommendation:***

Due to number of communities impacted, EPA recommends continued implementation of the on-going communication strategy to meet with land holders to discuss their options. EPA believes the public meetings are advantageous and will benefit the impacted communities.

**Air Quality**

The DEIS (Chapter 3, Section 3.3 and/or Appendix H) appears to be lacking detailed discussion of mitigation measures for construction-related and fugitive dust emissions. EPA suggests the Final EIS provide the following information and statements as appropriate:

- EPA acknowledges that as the project(s) are developed, analyzed and constructed, the potential environmental impacts will be addressed by the applicable permitting authorities (ADEQ and/or Oklahoma DEQ, DOE) and EPA Region 6 through the various permitting actions, approvals and studies as required by law.
- Any project involving prescribed burning should be done in accordance with all local, state and federal requirements and consistent with applicable Smoke Management Guidelines for each state.
- EPA asks that the following suggested mitigation measures be included to reduce impacts associated with emissions of fugitive dust, PM, and other pollutants from any planned construction-related activities. Our recommendations are as follows:

***Recommendations:***

**Fugitive Dust Source Controls:**

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative where appropriate at active and inactive sites during workdays, weekends, holidays, and windy conditions;

- Install wind fencing and phase grading operations where appropriate, and operate water trucks for stabilization of surfaces under windy conditions; and
- Prevent spillage when hauling material and operating non-earthmoving equipment and limit speeds to 15 miles per hour. Limit speed of earth-moving equipment to 10 mph.

Mobile and Stationary Source Controls:

- Plan construction scheduling to minimize vehicle trips;
- Limit idling of heavy equipment to less than 5 minutes and verify through unscheduled inspections;
- Maintain and tune engines per manufacturer's specifications to perform at EPA certification levels, prevent tampering, and conduct unscheduled inspections to ensure these measures are followed.